

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS LIABILITY
LITIGATION (NO. VI)

Civil Action No. MDL 875

This Document Relates to:

John Roland Brown and
Brenda C. Brown, wife,

District of South Carolina,

Civil Action No. 0:09-1555

Plaintiffs,

COMPLAINT

vs.

A.W. Chesterton Company;
Cleaver-Brooks, Inc., a Division of Aqua-Chem, Inc.;
Borg-Warner Morse TEC, Inc.;
CertainTeed Corporation;
Fluor Daniel, Inc.;

Fluor Daniel Services Corporation;
General Refractories Company;
Georgia Pacific Corporation;
National Service Industries, Inc.;

Rapid-American Corporation

*(successor by merger to Glen Alden Corporation,
Briggs Manufacturing Company, Philip Carey
Corporation and Philip Carey Manufacturing
Company);*

Union Carbide Corporation;
Viacom, Inc.

*(successor by merger to CBS Corporation f/k/a
Westinghouse Electric Corporation),*

Defendants,

Plaintiffs hereby adopt and incorporate Plaintiffs' Master Long Form Complaint in Re: Asbestos Litigation in the United States District Court for the Eastern District of Pennsylvania, filed as Miscellaneous No. 86-0457. Pursuant to the October 8, 2008, Order of Honorable Eduardo C. Robreno, the following short-form Complaint is utilized in this asbestos action:

1. John Roland Brown, The Injured Plaintiff ("plaintiff-worker") and Brenda C. Brown, ("plaintiff-worker's spouse"). Plaintiff 's Address, Social Security Number, and Date of Birth information is available upon request.

2. The Court has jurisdiction of this matter pursuant to the Multidistrict Litigation Order dated July 29, 1991, Civil Action No. MDL 875. Moreover, the Plaintiffs are citizens of the State of South Carolina and no defendant is a citizen or has a principal place of business in the State of South Carolina. Further, the amount in controversy, exclusive of interest and costs, exceeds \$100,000.00.

3. The Defendants are those companies listed in the caption.

4. Plaintiffs hereby incorporate by reference the following counts from the Master Long-Form Complaint: Counts I, II, III, IV and V.

5. Plaintiff-worker's asbestos employment history, including, to the extent possible at this time, the asbestos products to which deceased plaintiff-worker was exposed is attached hereto as Schedule I.

6. Plaintiff-worker was diagnosed with asbestosis by David A. Schwartz, M. D. on October 14, 2006.

7. Plaintiffs certify that they have not been a party to any related third-party asbestos litigation.

8. Plaintiffs hereby demand a trial by jury on all issues of fact.

Respectfully submitted,

WALLACE AND GRAHAM, P.A.

By: s/Mona Lisa Wallace
S.C. Bar No.: 07216
Attorney for Plaintiff
WALLACE & GRAHAM, P.A.
525 North Main Street
Salisbury, North Carolina 28144
Tel. No. (704) 633-5244
Fax: (704) 633-9434
E-Mail: mwallace@wallacegraham.com

Date: 6/12/09

JOHN ROLAND BROWN
SCHEDULE I
Plaintiff-Worker Employment History
Asbestos Exposure Worksite Information

OCCUPATION:

Pipe Fitter – New Schools
 Pipe Fitter – New Construction
 Pipe Fitter – Hospitals
 Pipe Fitter – Duke Energy
 Pipe- Fitter – Various
 Pipe Fitter Helper
 US Army
 Pipe Fitter Helper
 Surveyor Helper

EMPLOYER/WORKSITE:APPROXIMATE DATES:

Action Mechanical – Rock Hill & Fort Mill, SC	2004 – Present
Alta Refrigeration – Rock Hill, SC	2003
Performance Contracting – Rock Hill, SC	2002 – 2003
Embree Reed, Inc. – Charlotte, NC	1996 – 2002
Duke Energy – most all sites	1977 – 1996
Associated Mechanical Contractors – Clark Equipment	1977
Mecon, Inc. – American Chemical-Charlotte, NC	1976
Yargin Construction-Foote Mineral Co.-Kings Mountain, NC	1975
Gamewell Mechanical – Sandoz Chemical – Charlotte, NC	1973 – 1974
Piedmont Engineering – Bigger Bros. – Charlotte, NC	1972 – 1973
Industrial Piping, Inc. – American Chemical – Charlotte, NC	1971 – 1972
US Army – Fort Ord, CA	1969 – 1971
AME, Inc. – Fab Shop – Rock Hill, SC	1968 – 1969
Daniel Construction – Bowater Paper Mill-Catawba, SC	1968

RELATED ASBESTOS LITIGATION:

Workers Compensation Claim – Duke Energy – Settled

SMOKING HISTORY:

.5 ppd. 1/68 – 12/68 (only 1 yr.)

PRODUCTS CONTAINING ASBESTOS:

Raw Asbestos Fiber, Pipe Covering, Block, Cements, Gaskets, Refractory Materials, Boilers, Joint Compounds, Wall Board, and other asbestos containing materials.

DEPENDENTS:

Brenda C. Brown, wife

IN THE UNITED STATES DISTRICT COURT
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DEFENDANTS LIST

Cleaver-Brooks, Inc., a Division of Aqua-Chem, Inc.
7800 North 113th Street
Milwaukee, WI 53224-3136

Borg-Warner Morse TEC, Inc.
3850 Hamlin Road
Auburn Hills, MI 48326

CertainTeed Corporation
CT Corporation System
225 Hillsborough Street
Raleigh, NC 27603

A.W. Chesterton Company
PO Box 4004
Woburn, WA 01888-4004

Fluor Daniel, Inc.
Corporation Service Company
327 Hillsborough Street
Raleigh, NC 27603

Fluor Daniel Services Corporation
Corporation Service Company
327 Hillsborough Street
Raleigh, NC 27603

General Refractories Company
225 City Avenue, Suite 114
Bala Cynwyd, PA 19004

Georgia Pacific Corporation
CT Corporation System
75 Beattie Place
Greenville, SC 29601

National Service Industries, Inc.
Corporation Service Company
327 Hillsborough Street
Raleigh, NC 27603

Rapid-American Corporation
Corporation Service Company
2711 Centerville Road, Ste. 400
Wilmington, DE 19808-1645

Union Carbide Corporation.
CT Corporation System
225 Hillsborough Street
Raleigh, NC 27603

Viacom, Inc.
Corporation Service Company
2711 Centerville Road, Ste. 400
Wilmington, DE 19808-1645